

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,

Debtors.

)
) Chapter 11
)
) Case No. 23-00623 (TJC)
)
) Jointly Administered
)
)

**[PROPOSED] REDUCING PERIOD OF TIME BETWEEN OBJECTION DEADLINE
AND DISCLOSURE STATEMENT HEARING PURSUANT TO LOCAL RULE 3017-1**

Upon the motion (the “Motion”)¹ of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) for entry of an order (this “Order”) pursuant to Local Rule 3017-1 reducing the period of time between the bar date for objections to the disclosure statement portion of the Combined Plan and Disclosure Statement and the hearing date to consider approval of the disclosure statement portion of the Combined Plan and Disclosure Statement, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Public Administrative Order* referring bankruptcy cases entered by the United States District Court for the Northern District of Iowa; and this Court being able to enter a final order consistent with Article III of the United States Constitution; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the

¹ Capitalized terms used but not defined herein have the meanings given to such terms in the Motion.

Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefore, it is **HEREBY ORDERED THAT:**

1. The Motion is granted as set forth in this Order.
2. The Court finds that sufficient cause exists under Local Rule 3017-1 to reduce the period of time between the bar date for objections to the disclosure statement portion of the Combined Plan and Disclosure Statement and the hearing to consider approval of the disclosure statement portion of the Combined Plan and Disclosure Statement.
3. Pursuant to Local Rule 3017-1, the Court approves the period of time between the Objection Deadline and Hearing Date.
4. The Court shall hold a hearing on Wednesday, March 27, 2024 to consider approval of the disclosure statement portion of the Combined Plan and Disclosure Statement.
5. Counsel for the Debtors shall file a hearing and date notice in accordance with the dates set forth in this Order.
6. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated and entered this ____ day of _____, 2024.

Honorable Thad J. Collins, Chief Judge

Prepared and Submitted By:

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